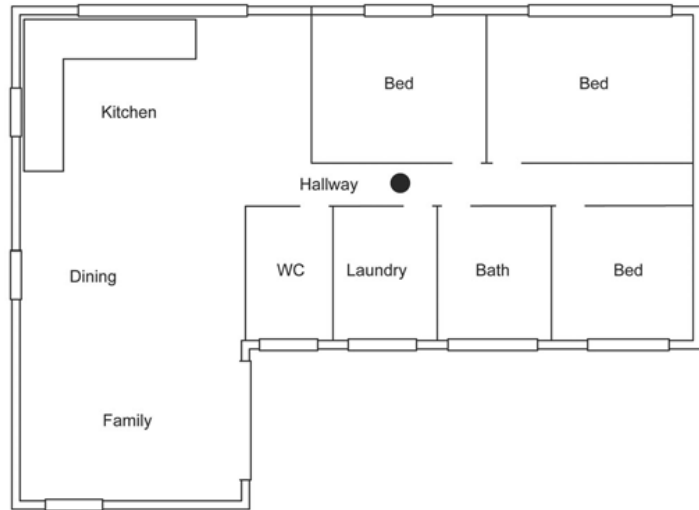


The Industry Association of Building and Property Inspectors in WA Inc – Inspect WA	
Position Paper 10. 2019	
Title: Residential Current Devices (RCD's), Smoke Alarms and Electrical Testing in WA Residential Property's	
Subject	Residential Current Devices (RCD's), Smoke Alarms and Electrical Testing in Residential Property's
Association Position	<p>Smoke Alarms</p> <ol style="list-style-type: none"> 1. Under the regulatory environment which exists in WA, Building Inspectors can: <ol style="list-style-type: none"> a. Note the number of Smoke alarms in a residential property and whether those Smoke Alarms are located in accordance with the BCA b. Note whether or no those alarms appear to be hardwired or not. 2. Building Inspectors are not permitted to <ol style="list-style-type: none"> a. Test Smoke Alarms b. Attest to the Smoke Alarms being Compliant or not <p>Residual Current Devices</p> <ol style="list-style-type: none"> 3. Under the regulatory environment which exists in WA, Building Inspectors can: <ol style="list-style-type: none"> a. Note the number of RCD's in a residential property 4. Building Inspectors are not permitted to <ol style="list-style-type: none"> a. Test RCD's b. Attest to the RCD's or the number of RCD's being Compliant or not <p>Circuit and Earth Testing</p> <ol style="list-style-type: none"> 5. Building Inspectors are not permitted to <ol style="list-style-type: none"> a. Test Circuits b. Test Power points c. Test Earth Leakage <p>The Association requires its Building Inspector Members to abide by the above position.</p>
Date Preparation Commenced	April 2020
Date Provisional Approval by Committee for Release to Members for Comment	May 2020
Final Approval by Committee and Release to Members	May 2020

<p>Why was the Paper Released</p>	<p>There were a number of key issues that contributed to the release of this Position Paper:</p> <ol style="list-style-type: none"> 1. There is a variety of legislative and regulatory requirements which related to Smoke Alarms and Residual Current Devices (RCD's) which need to be considered when a property is being sold. As a consequence these items are often referred to in Pre Purchase Building Inspections Reports. Further there are some building inspectors who are purporting to test power points, lights, circuits, smoke alarms and RCD's and record the results in Pre Purchase Building Inspection reports . 2. There is inconsistency and confusion within the broader industry about what Building Inspectors can and cannot do in relation to this issue. 3. The Building Code of Australia, which all Building Inspector Members of Inspect WA are conversant, identifies the need for and required location of Smoke Alarms. Hence, members are competent to comment on this item only. 4. Apart from the physical number of Smoke Alarms, there is a host of additional requirements including the need for the Smoke Alarms to generally be hardwired (some exemptions apply), fully operational, meet minimum Australian Standards, be in "service" and in some cases be interconnected where more than one alarm is required. 5. Prior to 1 January 2019 residential properties required to have a minimum of 2 RCD's protecting all power and lights in the residential property. Depending on the requirements of the individual property, there may have been a requirement for more than two RCD's. From 1 January 2019, all final electrical circuits require RCD's so it is likely that residential properties constructed after this date will require more than 2 RCD's, the final number being determined by the requirements of the property. 6. Persons who carry out any electrical work commit an offence unless the carrying out of that work by that person is authorised by a licence or permit. It is accepted that "testing" and electrical appliance (Smoke Alarms or RCD's) is defined as electrical work. Providing any assessment as to whether or not the electrical appliance is compliant or not would also be considered electrical work. 7. Unless a Building Inspector is a Licenced Electrical Contractor they are not permitted to undertake electrical work. Non Licenced (Electrical) Building inspectors are permitted to make observations as to the location of Smoke Alarms (as per the Building Code) and the physical number of RCD's in the meter box or sub board of a residential property. But their observations are limited to these items only.
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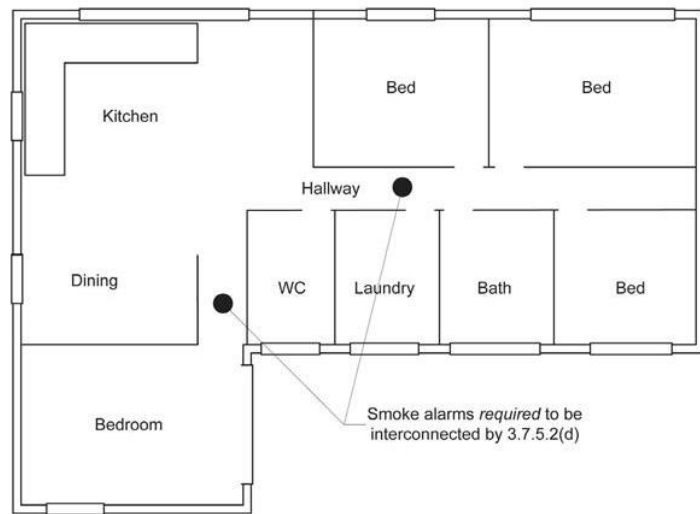
Key References	
Electricity (Licensing) Regulations 1991	<p>Part 3 — Licensing of electrical workers</p> <p>S 19. Electrical work prohibited unless authorised</p> <p>(1) Subject to this regulation, a person who, on or after the appointed day, carries out any electrical work commits an offence unless the carrying out of that work by that person is authorised by a licence or permit.</p>
Building Code of Australia	<p>3.7.5.5 Installation of smoke alarms</p> <p>Explanatory information:</p> <p>A smoke alarm can give spurious alarms if the atmosphere contains particles which obscure vision, such as could occur in a Class 10a <i>private garage</i> part of a building. NSW 3.7.5.2(a)(ii) therefore allows the use of a more suitable alarm, such as a heat alarm, in these locations.</p> <p>Where a Class 10a <i>private garage</i> is located beneath a Class 1a dwelling and is not associated with that dwelling, NSW 3.7.5.2(b) requires a heat alarm to be provided in the non-associated Class 10a <i>private garage</i> in accordance with NSW 1.1.4 in the NSW Additions. The NSW Addition also contains requirements for the interconnection of alarms and the provision of durable notices. NSW 3.7.5.2(a)(iv) requires alarms to be interconnected where there is more than one alarm. This only applies within a single dwelling. Therefore alarms in a Class 1a dwelling need not be interconnected with alarms in another dwelling.</p> <p>3.7.5.4 Location — Class 1b buildings</p> <p>In a Class 1b building, smoke alarms must be located in—</p> <ul style="list-style-type: none"> (a) every bedroom; and (b) every corridor or hallway associated with a bedroom, or if there is no corridor or hallway, in an area between the bedrooms and the remainder of the building; and (c) each other storey. <p>(see Figure 3.7.5.1, Diagram c)</p> <p>Figure 3.7.5.1 Diagram a Class 1a building where all bedrooms are grouped together and served by a hallway</p>



Legend for Figure 3.7.5.1 Diagram a:

Smoke alarm

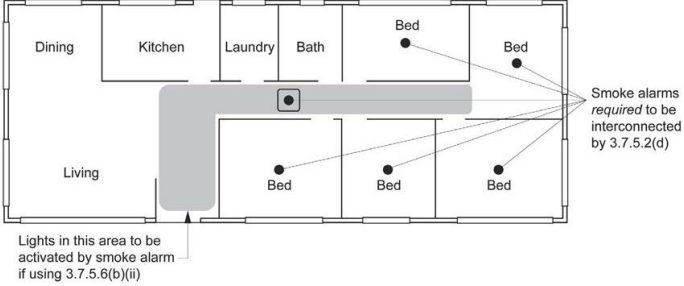
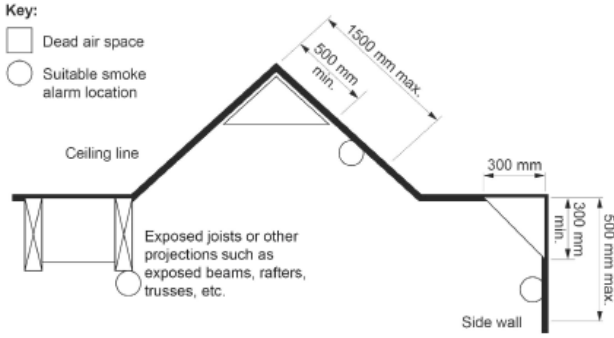
Diagram b Class 1a building where bedrooms are located in separate areas



Legend for Figure 3.7.5.1 Diagram b:

Smoke alarm

Diagram c Class 1b building where multiple bedrooms are served by a hallway

	 <p>3.7.5.5 Installation of smoke alarms</p> <p>Smoke alarms <i>required</i> by 3.7.5.3 and 3.7.5.4 must be installed on or near the ceiling, in accordance with the following:</p> <p>(a) Where a smoke alarm is located on the ceiling it must be—</p> <p>(i) a minimum of 300 mm away from the corner junction of the wall and ceiling; and</p> <p>(ii) between 500 mm and 1500 mm away from the high point and apexes of the ceiling, if the room has a sloping ceiling.</p> <p>(b) Where (a) is not possible, the smoke alarm may be installed on the wall, and located a minimum of 300 mm and a maximum of 500 mm off the ceiling at the junction with the wall</p>  <p>Diagram 1 – Installation of smoke alarms to avoid dead air space</p>
<p>WA Building Regulations 2012</p>	<p>56. Requirement to have smoke alarms or similar prior to transfer of dwelling</p> <p>(1) If an owner of a dwelling transfers the ownership of it, the owner must, to the extent practicable, ensure that at the time of the transfer —</p> <p>(a) the dwelling has smoke alarms installed so that the dwelling and the alarms comply with the requirements of regulation 60(2); or</p> <p>(b) if an approved alternative building solution applies in relation to the dwelling — the solution is in effect.</p> <p>Penalty for this subregulation: a fine of \$5 000.</p>
<p>Australian Standard for residential smoke alarms – AS 3786</p>	<p>Refer to the BCA for the relevant edition of AS 3786 that applies to your dwelling at the time of installation of the smoke alarms. Your local government may have a copy of the Standard that you can view at their front counter or library, or you can purchase a copy from SAI Global at</p>

		www.saiglobal.com The Standard can also be viewed at the Department of Commerce's WorkSafe library in Cannington
Electricity Regulations 1947		<p>12A. Installation of residual current devices</p> <p>(1) In this regulation — final subcircuit means a final subcircuit to which a socket outlet, lighting point or directly-connected hand-held appliance is connected.</p> <p>(2) Residual current devices are installed in accordance with this regulation in relation to residential premises, or common property relating to residential premises, if all of the following apply —</p> <p>(a) the number of residual current devices installed on the premises is at least —</p> <p>(i) 1, if the premises have 1 final subcircuit; and</p> <p>(ii) 2, if the premises have more than 1 final subcircuit;</p> <p>(b) if 2 or more residual current devices are installed on the premises, lighting points connected to final subcircuits are distributed between the devices;</p> <p>(c) each residual current device complies with AS/NZS 3190:2016 Approval and test specification — Residual current devices (current-operated earth-leakage devices);</p> <p>(d) each residual current device has a maximum rated residual current of 30 mA;</p> <p>(e) each residual current device protects not more than 3 final subcircuits;</p> <p>(f) each residual current device is installed at the switchboard at which each final subcircuit protected by it originates.</p>
AS/NZS 300		<p>AS/NZS 300 was released on June 26th 2018. AS/NZS 3000:2018 will commence on January 1st 2019.</p> <p>The new standard requires an RCD to be installed on every final sub circuit in the electrical installation of a residential premise. This includes circuits protecting hard-wired appliances such as ovens, air conditioners, etc. This affects all new residential building works and will result in more RCD's being installed on new properties. The requirement is not retrospective and will apply only to dwellings built after January 1st 2019.</p>
Key Definitions		
Electricity (Licensing) Regulations 1991	"electrical work"	means work on electrical machines or instruments, on an electrical installation or on electrical appliances or equipment to which electricity is supplied or intended to be supplied at a nominal pressure exceeding 50 volts alternating current or 115 volts direct current whether or not the thing on which the work is performed is part of, or is connected to or to be connected to, any distribution works or private generating plant and, where work is performed on any appliance, whether or not electricity is supplied or may be supplied thereto through an electric plug socket or socket outlet;

	"licence"	means a licence under these regulations and when used in Part 3 means an electrical worker's licence and when used in Part 4 means an electrical contractor's licence or a licence to carry out electrical work that is in-house electrical installing work for the purposes of Part 4;
	"permit"	means a permit under Part 3;
Other		
Key Issues for Consideration		
Additional Observations		
Disclaimer	This document is not intended to be Legal Advice. The document is only intended for Members of. The Industry Association of Building and Property Inspectors in WA. Where appropriate, readers of the document should seek their own independently legal advice	

Signed Chairman

The Industry Association of Building and Property Inspectors in WA – Inspect WA
May 2020

1. Public Release Template



Public Release – Position Paper 10.2019 – May 2020

The Industry Association of Building and Property Inspectors in WA Inc – Inspect WA is pleased to announce the release of its Position Paper on RCD's, Smoke Alarms and Electrical Circuits

Background

There were a number of key issues that contributed to the release of this Position Paper:

1. There is a variety of legislative and regulatory requirements which related to Smoke Alarms and Residual Current Devices (RCD's) which need to be considered when a property is being sold. As a consequence these items are often referred to in Pre Purchase Building Inspections Reports. Further there are some building inspectors who are purporting to test power points, lights, circuits, smoke alarms and RCD's and record the results in Pre Purchase Building Inspection reports .
2. There is inconsistency and confusion within the broader industry about what Building Inspectors can and cannot do in relation to this issue.
3. The Building Code of Australia, which all Building Inspector Members of Inspect WA are conversant, identifies the need for and required location of Smoke Alarms. Hence, members are competent to comment on this item only.
4. Apart from the physical number of Smoke Alarms, there is a host of additional requirements including the need for the Smoke Alarms to generally be hardwired (some exemptions apply), fully operational, meet minimum Australian Standards, be in "service" and in some cases be interconnected where more than one alarm is required.
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6. Persons who carry out any electrical work commit an offence unless the carrying out of that work by that person is authorised by a licence or permit. It is accepted that "testing" and electrical appliance (Smoke Alarms or RCD's) is defined as electrical work. Providing any assessment as to whether or not the electrical appliance is compliant or not would also be considered electrical work.
7. Unless a Building Inspector is a Licenced Electrical Contractor they are not permitted to undertake electrical work. Non Licenced (Electrical) Building inspectors are permitted to make observations as to the location of Smoke Alarms (as per the Building Code) and the physical number of RCD's in the meter box or sub board of a residential property. But their observations are limited to these items only.

The Associations position is:

Smoke Alarms

1. Under the regulatory environment which exists in WA, Building Inspectors can:
 - a. Note the number of Smoke alarms in a residential property and whether those Smoke Alarms are located in accordance with the BCA
 - b. Note whether or no those alarms appear to be hardwired or not.
2. Building Inspectors are not permitted to
 - a. Test Smoke Alarms
 - b. Attest to the Smoke Alarms being Compliant or not

Residual Current Devices

3. Under the regulatory environment which exists in WA, Building Inspectors can:
 - a. Note the number of RCD's in a residential property
4. Building Inspectors are not permitted to
 - a. Test RCD's
 - b. Attest to the RCD's or the number of RCD's being Compliant or not

Circuit and Earth Testing

5. Building Inspectors are not permitted to
 - a. Test Circuits
 - b. Test Power points
 - c. Test Earth Leakage

The Association requires its Building Inspector Members to abide by the above position.

Committee
Inspect WA
May 2020